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04 February 1997

From: Commanding Officer, Engineering Field Activity, West, Naval Facilities Engineering
Command
To: Distribution

Subj: ECOLOGICAL RISK ASSESSMENT, PHASE 1B, ENGINEERING FIELD
ACTIVITY, WEST, NAVAL FACILITIES ENGINEERING COMMAND,
HUNTERS POINT SHIPYARD, SAN FRANCISCO, CALIFORNIA

Encl: (1) January 29, 1997 PRC letter to William Radzevich (Draft)

1. In accordance with the Hunters Point Annex Federal Facilities Agreement (FAA), the Navy has revised the estimated date for submission of the Response to Comments (RTC) on the Hunters Point Shipyard, Phase 1B Ecological Risk Assessment, Report to March 17, 1997, from February 14, 1997. As discussed at the January 30, 1997 BCT/RPM meeting, the RTC will be submitted instead of a Draft-Final Phase 1B Ecological Risk Assessment Report at this time. In addition, the Navy believes that the Phase 2 Workplan, the next submittal shown on the Parcel F FFA schedule after the Phase 1B Report, should be held in abeyance pending further discussion on a schedule for Parcel F Record of Decision.

2. Enclosure (1) has been provided for review and reference, and it contains an outline of those agency comments that the Navy believes could be deferred to a Parcel F feasibility study without a negative impact on the understanding of the Phase 1B Ecological Risk Assessment Report, and also those comments that would be addressed directly in Phase 1B Ecological Risk Assessment Report RTC.

3. If you have any questions regarding these changes, please contact Mr. William Radzevich, Code 1832.2 at (415) 244-2555.

Original signed by:

RICHARD E. POWELL
Lead Remedial Program Manager for HPS/TI
By direction of
the Commanding Officer

Distribution:

U.S. Environmental Protection Agency (Attn: Shery Lauth)
California Department of Toxic Substances Control (Attn: Cyrus Shabahari)
California Regional Water Quality Control Board (Attn: Richard Hiatt)

Copy to:
PRC Environmental Management (Attn: Mr. James Sickles)

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January 29, 1997

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PRC

Mr. William Radzevich
Engineer-In-Charge
Engineering Field Activity West
Naval Engineering Systems Command
900 Commodore Avenue, Building 208
San Bruno, California 94066-5006

**Subject: Response to Comments on the Draft Phase 1B Ecological Risk Assessment Report
Hunters Point Shipyard, San Francisco, California
Contract No. N62474-94-D-7609, Contract Task Order No. 009**

Dear Mr. Radzevich:

As part of a preliminary scoping discussion of the Parcel F feasibility study (FS), the Navy had requested that PRC Environmental Management, Inc. (PRC) review comments received from the regulatory agencies on the draft Phase 1B ecological risk assessment report. PRC was specifically requested to evaluate the appropriateness of deferring certain issues for analysis as part of the FS. The following summary lists those agency comments that PRC believes could be deferred to the Parcel F FS without leaving the Phase 1B report incomplete. The comments evaluated were received from the U.S. Environmental Protection Agency (EPA), the State of California Department of Toxic Substances Control (DTSC), the DTSC Human and Ecological Risk Division, the State of California Regional Water Quality Control Board (RWQCB), and the National Oceanographic and Atmospheric Administration (NOAA).

COMMENTS FROM EPA

General Comments: Comments 2, 7, and 10 would be partially answered in the response to comments and partially deferred to the FS. Comments 3, 4, 8, 9, 11, and 12 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Specific Comments - Volume 1 Part 1: Comments 21 and 24 would be partially answered in the response to comments and partially deferred to the FS. Comments 3, 7, 8, 19, 28, 33, 34, 35, 36, and 37 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Specific Comments - Volume 1 Part 2: Comments 9 and 22 would be partially answered in the response to comments and partially deferred to the FS. Comments 14, 15, 16, 17, 21, 25, 30, and 34 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Enclosure (1)

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EPA Ecological Risk Assessor Comments: Comments 5, 6, 19, 30 and 32 would be partially answered in the response to comments and partially deferred to the FS. Comments 2, 3, 8, 9, 11, 12, 14, 15, 17, and 29 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

COMMENTS FROM DTSC

General Comments: Comments 3 and 5 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Specific Comments: Comments 10 and 11 would be partially answered in the response to comments and partially deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

COMMENTS FROM DTSC HUMAN AND ECOLOGICAL RISK DIVISION

General Comments: Comment 1 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Specific Comments: Comments 2 and 11 would be partially answered in the response to comments and partially deferred to the FS. Comments 3, 10, 15, 26, 28, and 29 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Conclusions: Comment 2 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

COMMENTS FROM RWQCB

General Comments: Comment 3 would be partially answered in the response to comments and partially deferred to the FS. Comments 1, 4, and 6 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Specific Comments - Volume 1 Part 2: Comment 34 would be partially answered in the response to comments and partially deferred to the FS. Comments 20, 24, and 25 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Specific Comments - Volume 2: Comment 38 would be deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

COMMENTS FROM NOAA

Specific Comments - Volume 1 Part 1: Comments concerning Figure 3-1 and Section 7.2.3 would be deferred to the FS. Comments concerning Section 7.0, and Section 8 would be partially answered in

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the response to comments and partially deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Specific Comments - Volume 1 Part 2: The comment concerning Section 2.1.1.1 would be deferred to the FS, and the comment concerning Section 2 would be partially answered in the response to comments and partially deferred to the FS. All other comments would be directly addressed in the Phase 1B response to comments.

Please call me at (415) 222-8344 or Jim Baker at (713) 520-7667 if you have any questions about this summary.

Sincerely,

Jim Sickles
Project Manager

Enclosure

cc: Jim Baker, PRC Houston
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